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94-123



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FCC MAIL ROOM

September 13, 1994

Mr. Reed Hundt, Chairman  
Federal Communications Commission  
1919 M Street, N.W.  
Washington, D.C. 20554

Dear Chairman Hundt,

It is my understanding that the Federal Communications Commission will be looking to relax the Prime Time Access Rule. Speaking for my station, I urge you to keep the "off-network" part of the rule in tact. It is vitally important to KTXL and is really necessary to keep the current diversity and competition going in local television markets.

Without the off-network rule, independent stations will have a difficult time securing rights to top quality off-network programs to air during the access time period. This in turn will have a negative impact on my station's ability to finance programs for other dayparts including news and public affairs.

There are major changes taking place in the broadcast industry. Mergers between networks and program producers are not far off. If this happens and the big three networks enter the off-network and first run syndication market, my station will have a difficult time obtaining the rights to programs. Eliminating the off-network rule could make it impossible. Without PTAR and the off-network rule, TV viewers will get all of their programs from a few telecommunications giants. This is not in the public interest.

If the FCC does examine the issue, it should do so in the context of a neutral Notice of Inquiry. The Commission should not proceed directly to rule-making. There are too many unresolved and complex issues which have not been discussed on the record.

I urge you to proceed with extreme care and retain the off-network rule.

Sincerely,

*Michael A. Fisher*

Michael A. Fisher  
President/General Manager

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Federal Communications Commission  
Office of Mass Media - Chief Roy Stewart  
1919 M Street, N.W. - Room 314  
Washington, DC 20554

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JACK L. PECK  
Vice President and  
General Manager

Dear Chief Stewart,

I understand that at its October meeting the Federal Communications Commission may initiate a proceeding looking to relax the Prime Time Access Rule. On behalf of station WPTY in Memphis, TN, I strongly urge you to retain the "off-network" portion of the rule.

The off-network rule is vitally important to my station and is absolutely necessary to promote diversity and competition in local television markets. In fact, the off-network portion of the Prime Time Access Rule has been instrumental in creating a competitive independent television industry. It is also an essential element in the Commission's long held goal of creating new off-air television networks.

Without the off-network rule, independent stations will have a difficult time securing the rights to top quality off-network programming to air during the access period. This in turn will have a negative impact on my station's ability to finance programming for other dayparts, including local news and public affairs programming.

It is no secret that major changes are taking place in the broadcast industry. Mega mergers between the big three networks poised to enter the off-network and first run syndication market, my station will have a difficult time obtaining the rights to programming. Eliminating the off-network rule may make it impossible. Without PTAR and the off-network portion of the rule, the American public will receive all of its programming from a few telecommunications giants. Such a result is not in the public interest.

If the FCC intends to examine this issue, it should do so in the context of a neutral Notice of Inquiry. At this time the FCC should not proceed directly to rule making. There are too many unresolved and complex issues which have not been discussed on the record.

Proposals to eliminate the off-network provision of PTAR will return us to a system where the three major networks can squeeze out independent producers and stifle competition from stations not affiliated with the big three networks. The Commission should not abdicate its responsibility to promote competition. Stations such as my own deserve a chance to compete. I urge you to proceed with extreme care and retain the off-network rule.

Sincerely,

*Jack*  
Jack L. Peck  
FOX 24 WPTY

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2225 Union Avenue  
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Memphis, TN 38174-2424  
(901) 278-2424  
FAX (901) 272-8759



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94-133

SEP 19 3 10 PM '94

Jerry Carr  
General Manager

September 15, 1994

Office of Chairman Reed Hundt  
Federal Communications Commission  
1919 M. Street NW Room 814  
Washington, DC 20554

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Dear Chairman Hundt:

As an independent station operator in Miami, Florida, I am extremely concerned that the FCC plans to examine the Prime Time Access Rule in the near future. I am hopeful that the "official network" aspects of the rule will be left in place.

In Miami, the Prime Time Access Rule has allowed two (2) independent stations to flourish alongside a full complement of ABC, NBC, CBS and FOX affiliates. These two (2) stations now may each, in turn, become an affiliate of the proposed Warner Brother's and Paramount networks, respectively. In essence, the Commission's desire to see new television networks emerge has been fulfilled, in part, by the off-net provisions of PTAR.

Our station's viability depends on our ability to acquire top-notch off-network programming for the prime access time period. As our most profitable daypart, any decline in our competitiveness in this area will crimp our ability to finance public affairs and children's educational program efforts. Furthermore, as studio groups and networks collaborate to enter first run syndication, many alternative sources of programming will be squeezed out. We'll be left with a few, behemoth distributors providing all programming for the American public.

I strongly urge the FCC to examine this issue closely before considering any rule making. The complex competitive issues surrounding PTAR and the off-network rule deserve intense scrutiny before any changes are effected.

Sincerely,

JERRY CARR

IC/ps

b:work4/senate3

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DOCKET FILE COPY ORIGINAL

WGTW-TV 48 3900 MAIN STREET, PHILADELPHIA, PA 19127



September 12, 1994

Mr. Reed Hundt, Chairman  
Federal Communications Commission  
1919 M Street N.W.  
Room 814  
Washington, D.C. 20554

SEP 15 1994

Dear Mr. Hundt:

FCC MAIL ROOM

I understand that at the October meeting the Commission may consider initiating a proceedings to relax the Prime Time Access Rule. In your deliberation please consider the retention of the "off-network" portion of the rule.

The off-network rule is vitally important to WGTW-TV and is necessary to promote diversity and competition at the local television level. In fact, the off-network portion of the Prime Time Access Rule has been instrumental in creating a competitive independent television industry. It is also an essential element in the Commission's long held goal of creating new off-air television networks.

Without the off-network rule, independent stations like ours will have a difficult time securing the rights to top quality off-network programming to air during the access period. This in turn will have a negative impact on our station's ability to finance programming for other dayparts, including local news and public affairs programming.

Each day major changes are taking place in the broadcast industry. Mega mergers between the networks and major program producers appears to be on the horizon. With the three networks poised to enter the off-network and first run syndication market our station will most likely have a difficult time obtaining the rights to programming. Eliminating the off-network rule may make it impossible. Without PTAR and the off-network portion of the rule, it is conceivable that the American public will receive all of its programming from a few telecommunications giants. We believe such a result would not be in the public interest.

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PHONE: (215) 930-0482

FAX: (215) 930-0496

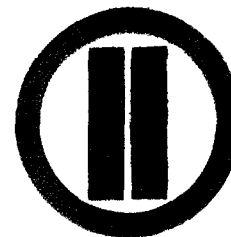
If the FCC intends to examine this issue, we would hope that it would do a Notice of Inquiry and at the time of initial deliberations not proceed directly to a rule making. Thereby many unresolved and complex issues which have not been discussed on the record would have an opportunity to be heard.

Proposals to eliminate the off-network provision of PTAR will return us to a system where the three major networks can squeeze out independent producers and stifle competition from station not affiliate with them. We ask that the Commission continue efforts to promote competition. Stations such as ours deserve a chance to compete. We ask that you proceed with caution and retain the off-network rule so that stations can continue to exist.

Yours truly,

  
Dorothy E. Brunson  
President/General Manager

94-153



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September 12, 1994

**WPIX INC.**  
220 EAST 42ND STREET  
NEW YORK, NY., 10017  
(212) 210-2801

MICHAEL EIGNER  
EXECUTIVE VICE PRESIDENT  
GENERAL MANAGER

Chairman Reed Hundt  
Federal Communications Commission  
1919 M Street, N.W.  
Washington, D.C. 20554

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**SEP 15 1994**

Dear Chairman Hundt:

**FCC MAIL ROOM**

I understand that at its October meeting, the Federal Communications Commission may initiate a proceeding looking to relax the Prime Time Access Rule. On behalf of station WPIX in New York, I strongly urge you to retain the "off-network" portion of the rule.

The off-network rule is vitally important to my station and is absolutely necessary to promote diversity and competition in local television markets. In fact, the off-network portion of the Prime Time Access Rule has been instrumental in creating a competitive independent television industry. It is also an essential element in the commission's long held goal of creating new off-air television networks.

Without the off-network rule, independent stations will have a difficult time securing the rights to top quality off-network programming to air during the access period. This in turn will have a negative impact on my station's ability to finance programming for other dayparts, including local news and public affairs programming.

It is no secret that major changes are taking place in the broadcast industry. Mega mergers between the big three networks and major program producers appear to be on the horizon. With the big three networks poised to enter the off-network and first run syndication market, my station will have a difficult time obtaining the rights to programming. Eliminating the off-network rule may make it impossible. Without PTAR and the off-network portion of the rule, the American public will receive all of its programming from a few telecommunications giants. Such a result is not in the public interest.

If the FCC intends to examine this issue, it should do so in the context of a neutral Notice of Inquiry. At this time the FCC should not proceed directly to rule making. There are too many unresolved and complex issues which have not been discussed on the record.

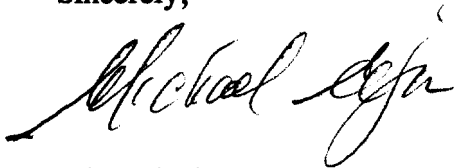
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Chairman Reed Hundt  
Federal Communications Commission  
Page Two

Proposals to eliminate the off-network provision of PTAR will return us to a system where the three major networks can squeeze out independent producers and stifle competition from stations not affiliated with the big three networks. The Commission should not abdicate its responsibility to promote competition. Stations such as my own deserve a chance to compete. I urge you to proceed with extreme care and retain the off-network rule.

Sincerely,

A handwritten signature in cursive script, appearing to read "Michael Eigner".

Michael Eigner

ME:bl

Suite 300  
10 E. Cambridge  
Circle Drive  
Kansas City  
Kansas 66103

913.621.6262

facsimile  
913.621.4703

**KSMO TV 62**

September 12, 1994

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→ MMB  
94-120  
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SEP 15 1994

FCC MAIL ROOM

Ms. Ruth Milkman  
Senior Legal Advisor, Rm. 814  
Federal Communications Commission  
1919 M Street, N.W.  
Washington, D.C. 20554

Dear Ms. Milkman:

I understand that at its October meeting the Federal Communications Commission may initiate a proceeding looking to relax the Prime Time Access Rule. On behalf of station, KSMO-TV62, strongly urge you to retain the "off-network" portion of the rule.

The off-network rule is vitally important to my station and is absolutely necessary to promote diversity and competition in local television markets. In fact, the off-network portion of the Prime Time Access Rule has been instrumental in creating a competitive independent television industry. It is also an essential element in the Commission's long held goal of creating new off-air television networks.

Without the off-network rule, independent stations will have a difficult time securing the rights to top quality off-network programming to air during the access period. This in turn will have a negative impact on KSMO-TV62's ability to finance programming for other dayparts, including local news and public affairs programming.

It is no secret that major changes are taking place in the broadcast industry. Mega mergers between the big three networks and major program producers appear to be on the horizon. With the big three networks poised to enter the off-network and first run syndication market, my station will have a difficult time obtaining the rights to programming. Eliminating the off-network rule may make it impossible. Without PTAR and the off-network portion of the rule, the American public will receive all of its programming from a few telecommunications giants. Such a result is not in the public interest.

If the FCC intends to examine this issue, it should do so in the context of a neutral Notice of Inquiry. At this time, the FCC should not proceed directly to rule making. There are too many unresolved and complex issues which have not been discussed on the record.

Proposals to eliminate the off-network provision of PTAR will return us to a system where the three major networks can squeeze out independent producers and stifle competition from stations not affiliated with the big three networks. The Commission should not abdicate its responsibility to promote competition. Stations such as KSMO-TV62 deserve a chance to compete. I urge you to proceed with extreme care and retain the off-network rule.

Sincerely,



*Jim MacDonald*  
Jim MacDonald  
V.P./General Manager

JM/cn

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10 E. Cambridge  
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facsimile  
913.621.4703

**KSMO TV 62**

September 12, 1994

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*Doug Webbink et al*  
**94-123**

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**FCC MAIL ROOM**

Ms. Renee Licht  
Mass Media Deputy Chief, Rm. 314  
Federal Communications Commission  
1919 M Street, N.W.  
Washington, D.C. 20554

Dear Ms. Licht:

I understand that at its October meeting the Federal Communications Commission may initiate a proceeding looking to relax the Prime Time Access Rule. On behalf of station, KSMO-TV62, strongly urge you to retain the "off-network" portion of the rule.

The off-network rule is vitally important to my station and is absolutely necessary to promote diversity and competition in local television markets. In fact, the off-network portion of the Prime Time Access Rule has been instrumental in creating a competitive independent television industry. It is also an essential element in the Commission's long held goal of creating new off-air television networks.

Without the off-network rule, independent stations will have a difficult time securing the rights to top quality off-network programming to air during the access period. This in turn will have a negative impact on KSMO-TV62's ability to finance programming for other dayparts, including local news and public affairs programming.

It is no secret that major changes are taking place in the broadcast industry. Mega mergers between the big three networks and major program producers appear to be on the horizon. With the big three networks poised to enter the off-network and first run syndication market, my station will have a difficult time obtaining the rights to programming. Eliminating the off-network rule may make it impossible. Without PTAR and the off-network portion of the rule, the American public will receive all of its programming from a few telecommunications giants. Such a result is not in the public interest.

If the FCC intends to examine this issue, it should do so in the context of a neutral Notice of Inquiry. At this time, the FCC should not proceed directly to rule making. There are too many unresolved and complex issues which have not been discussed on the record.

Proposals to eliminate the off-network provision of PTAR will return us to a system where the three major networks can squeeze out independent producers and stifle competition from stations not affiliated with the big three networks. The Commission should not abdicate its responsibility to promote competition. Stations such as KSMO-TV62 deserve a chance to compete. I urge you to proceed with extreme care and retain the off-network rule.

Sincerely,



Jim MacDonald  
V.P./General Manager



**Royals**

JM/cn

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